

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

4 AMY DUNN, individually and))
As the natural parent of)
DANIELLE DEMONBREUN,)
5 JAMES DUNN and RONALD)
CURTIS PATTERSON,)
6)
7 Plaintiffs,) CIVIL ACTION FILE NO.:
8) 2:17-CV-00246-RWS
vs.)
9)
COLUMBIA NATIONAL)
INSURANCE COMPANY)
10)
Defendant.)

12 The video deposition of RONALD CURTIS PATTERSON
13 taken on the instance of the Plaintiffs, pursuant to
14 stipulations herein, the reading and signing of the
15 deposition being reserved; before Aurora Gutierrez,
16 Certified Court Reporter, at 125 Maple Street,
17 Gainesville, Georgia, commencing at approximately 10:02
18 a.m., on Wednesday, June 20, 2018.

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1 VIDEO TECHNICIAN: Good morning. We're going
2 on the record at 10:02 a.m. on Wednesday, June 20,
3 2018. Please note that the microphones are
4 sensitive and make whispering, private
5 conversations and cellular interference. Please
6 turn off all cell phones or place them away from
7 the microphones, as they can interfere with the
8 deposition audio. Audio and video recording will
9 continue to take place unless all parties agree to
10 go off the record.

11 This is the video-recorded deposition of
12 Donald Curtis taken by counsel for defendant in the
13 matter of Amy Dunn et al. versus Columbia National
14 Insurance Company filed in the U.S. District Court,
15 for the North District of Georgia, Gainesville
16 Division.

17 This deposition is being held at the Law
18 Offices of Fox and Chandler located at 125 Maple
19 Street in Gainesville, Georgia.

20 My name is Ervin Parkas from the firm Veritext
21 and I'm the videographer. The court reporter is
22 Aurora Gutierrez from the firm Appalachian Court
23 Reporting.

24 I am not related to any party in this action,
25 nor am I financially interested in the outcome.

1 Counsel will now state their appearances and
2 affiliations for the record.

3 MR. DOLDER: This is Rich Dolder here for
4 Mr. Patterson.

5 MR. ALEXANDER: I'm Mark Alexander. I'm here
6 on behalf of the plaintiffs in the case -- well,
7 the plaintiffs Amy Dunn, individually and as a
8 natural parent of Danielle Demonbreun and James
9 Dunn.

10 MR. RAPP: Steve Rapp for defendant, Columbia
11 National Insurance Company.

12 VIDEO TECHNICIAN: Will the court reporter
13 please swear in the witness.

14 RONALD CURTIS PATTERSON, having been first
15 duly sworn, was examined and testified as follows:

16 MR. DOLDER: Can you please put on the record
17 that the witness will read and sign.

18 MR. ALEXANDER: This is going to be the
19 deposition of Ronald Curtis Patterson taken in this
20 case pursuant to notice and pursuant to the
21 agreement of counsel. The deposition is being
22 taken for all purposes permitted by the Georgia
23 Civil Practice Act. And Mr. Patterson's counsel
24 has indicated he wishes to read and sign the
25 deposition.

1 I assume all objections will be reserved --
2 all objections except as to the form of the
3 question will be reserved until such time as the
4 deposition is sought to be used.

5 MR. RAPP: Fine with me.

EXAMINATION

7 BY MR. ALEXANDER:

8 Q Mr. Patterson, my name is Mark Alexander. I
9 represent basically the Dunn Family, and I want to ask
10 you a handful of questions, sort of about your time
11 with Lawson Heating -- well, Lawson, is it Air
12 Conditioning and Plumbing?

13 A Yes, sir.

14 Q And your use of the truck and maybe some other
15 folks' use of trucks while at Lawson, okay?

16 A Okay.

17 Q I want to kind of backup and begin when you
18 started at Lawson. Now, my notes reflect that you
19 began initially or were initially hired by Lawson
20 sometime in 2004. Does that sound about right to you?

21 A Yes, sir.

22 Q And when you were initially hired by Lawson,
23 what was the position that you were hired for?

24 A A plumber's helper.

25 Q And when you were working for Lawson initially

1 in 2004 as a plumber's helper, were you provided or
2 assigned a truck or vehicle to use?

3 A No, sir.

4 Q Did you, though, often ride with other folks
5 in Lawson vehicles to and from job sites?

6 A Yes, sir.

7 Q And was it a plumber's -- did I understand
8 correctly that a plumber's foreman that basically
9 had -- that was assigned a truck?

10 A That's correct.

11 Q And would they be the people that would drive
12 you around to the various job sites?

13 A Yes, sir.

14 Q Were there times when the plumber's foreman
15 would occasionally use the truck for personal use?

16 MR. RAPP: Object to form.

17 THE WITNESS: Yes, sir.

18 MR. ALEXANDER: Okay. What's the -- I just
19 want to make sure I correct the form of the
20 question if there's an issue.

21 MR. RAPP: Sure. Personal use is vague.

22 Q (By Mr. Alexander) Okay. Well,
23 Mr. Patterson, do you understand -- what's your
24 understanding when I say personal use? Do you
25 understand that to mean using it for something other

1 than a business purpose?

2 A Yes, sir.

3 Q Okay. And so when I talk about other foremen
4 who you rode with using Lawson's truck for personal
5 use, I'm talking about using it for a matter other than
6 a business purpose for Lawson, do you understand that?

7 A I do.

8 Q Okay, wonderful. And were there times when
9 you were riding with these other foremen in a Lawson
10 truck where they would use a truck for something other
11 than for personal use or other than a business purpose?

12 A Yes, sir.

13 Q And was that something that was generally
14 accepted by Lawson at that time, that foremen could use
15 the truck for personal use?

16 A Yes, sir.

17 Q And did you understand that Lawson provided a
18 truck to the plumbing foremen sort of as a perk of the
19 job?

20 A Absolutely.

21 Q Now, after you worked for Lawson, I see that
22 you had a stint with Hulsey Environmental?

23 A That's correct.

24 Q Did they provide you or assign you a truck at
25 that time?

1 A Eventually.

2 Q Okay.

3 A Not at the time of hiring.

4 Q Okay. And when they assigned you -- when they
5 eventually assigned you a truck, was that sort of
6 similar to how it was with Lawson's foreman, that the
7 truck was sort of a perk of the job?

8 A Absolutely.

9 Q Okay. And then it looks like you had some
10 period of time working for Gainesville Mechanical?

11 A Yes, sir.

12 Q And then my notes look like they show that you
13 went back to work with Lawson a second time in about
14 June of 2012?

15 A That's correct.

16 Q Now, when you went back to work with Lawson in
17 June of 2012, did you interview for the job?

18 A Yes, sir.

19 Q Now, what was the job that you were
20 interviewing for?

21 A Plumber's foreman.

22 Q Okay. Now, is that a little bit different
23 than the job you had initially with Lawson back in
24 2004?

25 A Yes, sir.

1 Q Okay. Can you just briefly tell me what the
2 difference is.

3 A It holds a lot more responsibility and skill
4 set is required.

5 Q And did you obtain those additional skill sets
6 from 2004 to 2012 while you were working at Hulsey
7 Environmental and Gainesville Mechanical?

8 A Yes, sir.

9 Q And did you interview for the job? Did I
10 already ask you that? Did you go to an interview to
11 actually sit down and people from Lawson --

12 A With Lawson, yes, sir.

13 Q Okay. I'm sorry. And I'm talking about the
14 job in June 2012, the second time you worked for
15 Lawson?

16 A That is correct.

17 Q All right. So did you interview with -- my
18 notes show maybe Matthew Poole and Ottie Rich?

19 A That is correct.

20 Q And did they ultimately hire you basically
21 that same day as a plumbing foreman in the commercial
22 plumbing department of Lawson?

23 A That is correct.

24 Q Now, did they provide you with any tools to
25 use?

1 A Yes, sir.

2 Q Okay. Did you have tools of your own that you
3 would use for the job?

4 A Yes, sir.

5 Q Did you negotiate with them what the pay would
6 be, what your pay would be for Lawson?

7 A Yes, sir.

8 Q How did that go?

9 A I was asking for a starting rate at \$20 an
10 hour, \$20 an hour. They was trying to get me to go for
11 \$18 or \$19. I believe it was \$18. I wasn't going to
12 go for that. Mr. Poole said if you'll come on board
13 with us at the lower pay, I'll go ahead and give you a
14 truck off the bat.

15 Q Okay. And was that a truck that -- did he
16 indicate that that was going to be just a perk of the
17 job?

18 A Absolutely.

19 Q Now, in addition to providing you with the
20 truck -- and I'll talk about that in just a minute --
21 did Lawson also provide you with a cell phone as a perk
22 of the job?

23 A Yes, sir.

24 Q And did Lawson provide you permission to use
25 the cell phone for both business purposes and for some

1 personal calls or personal use?

2 A Yes, sir.

3 Q And was Lawson aware that you used the phone
4 for both business purposes and also some personal use?

5 MR. RAPP: Object to form.

6 MR. ALEXANDER: Okay.

7 MR. RAPP: Calls for speculation.

8 Q (By Mr. Alexander) All right. Well, you can
9 go ahead and answer this. Was Lawson aware that you
10 used the phone for both business purposes and some
11 personal calls?

12 A Yes, sir.

13 Q And how did Lawson know that?

14 A From the billing on cell phones for monthly.

15 Q Okay. So Lawson would get the bills and they
16 could see whether there were some personal calls on
17 there?

18 A Yes, sir.

19 Q Now, they -- kind of like the cell phone that
20 they provided you, did they -- when they provided you
21 this truck, did they provide you the truck as a perk of
22 the job for both business purposes and some personal
23 use?

24 A Yes, sir.

25 Q And was it just that you get to use a truck

1 and you just would show up in the morning and pick any
2 truck out of the fleet of trucks or was there a
3 specific truck that Lawson assigned to you?

4 A Specific.

5 Q And did they provide -- did they assign and
6 provide you that specific truck shortly upon your
7 beginning to work with them in June of 2012?

8 A Yes, sir.

9 Q And my notes look like that truck was a 2005
10 Chevy 2500 pickup truck; does that sound right?

11 A Sounds right. I'm not for sure the year of
12 the truck, but it was in that general area.

13 Q And that's the truck that was specifically
14 assigned to you?

15 A Yes, sir.

16 Q Did they give you keys to the truck?

17 A Yes, sir.

18 Q Did they -- did you put the keys to the Chevy
19 pickup truck that was assigned to you on your key ring
20 with all your other personal keys?

21 A That's correct.

22 Q Is this the same truck that you used basically
23 every day from the time you started with Lawson for
24 about a year until the incident with the Dunns that
25 happened almost a year later?

1 A It is.

2 Q Would you just leave the truck at Lawson's, I
3 guess, parking lot and drive your own car to Lawson and
4 then use your truck, or how did that go?

5 A No, sir. I drove that truck full-time from
6 home to work, to job sites, from job sites to -- yes,
7 sir, all the time.

8 Q Grocery stores occasionally?

9 A Yes.

10 Q Okay. And did you -- what about over the
11 weekends, would you drive the truck over the weekends?

12 A Yes, sir.

13 Q Take it home over the weekends?

14 A Yes.

15 Q Use it occasionally over the weekends?

16 A Yes, sir.

17 Q What about over holidays?

18 A Yes, sir.

19 Q Drive it home over the holidays?

20 A Yes, sir.

21 Q It's not a truck you would leave at Lawson,
22 for example, over the holidays or the weekends?

23 A No, sir.

24 Q And occasionally use it over the holidays?

25 A Yes, sir.

1 Q Did you -- you mentioned that you had some
2 personal tools that you used for the job. Did you keep
3 your personal tools in that truck that was assigned to
4 you?

5 A Yes, sir.

6 Q Did you keep other personal stuff of yours,
7 you know, in the truck that was assigned to you?

8 A Yes.

9 Q Did Lawson provide you with a gas card?

10 A Yes, sir.

11 Q And did -- when you used the truck over the
12 weekends or on personal errands, who paid for the gas?

13 A Lawson's.

14 Q Okay. Because it was on the gas card that
15 you -- that they gave you?

16 A That's correct.

17 Q So you wouldn't go put your own gas in the
18 truck?

19 A Absolutely not.

20 Q All right. Did anybody from Lawson ever tell
21 you you were spending too much on gas?

22 A No, sir.

23 Q Or ever criticize you for buying gas and using
24 the truck for some personal errands?

25 A No, sir.

1 Q When Lawson provided the truck or assigned the
2 truck to you, did they provide you the truck for your
3 convenience as well as Lawson's?

4 MR. RAPP: Object to form. Same, calls for
5 speculation. You keep asking him why Lawson -- why
6 they did stuff.

7 Q (By Mr. Alexander) Let me ask you this way:
8 Are you aware of when Lawson provided you the truck?
9 Did they -- if they provided you the truck for both
10 your convenience and Lawson's?

11 A Yes, sir.

12 Q And did Lawson indicate to you that you were
13 to basically treat your respective vehicle as if it
14 were your own?

15 A That's correct.

16 Q Now, before this wreck happens -- this wreck
17 happens in June -- on June -- my notes say June 7,
18 2013. Does that sound about right to you?

19 A Yes, sir.

20 Q Okay. And when I say this wreck or this
21 accident, that's the accident that involves the Dunn
22 Family that occurred at WalMart. Are you familiar with
23 what I'm talking about?

24 A That's what I'm understanding, yes, sir.

25 Q Okay. And before that time, you had

1 permission from Lawson to use the truck assigned to you
2 for your personal use if you chose to do so?

3 A Yes, sir.

4 Q And did Lawson have knowledge that you
5 occasionally would use the truck for your personal use?

6 MR. RAPP: Object to form.

7 THE WITNESS: Yes, sir.

8 MR. ALEXANDER: And the form is what?

9 MR. RAPP: Exact same thing, does Lawson know
10 who, Lawson the company, how do they know?

11 MR. ALEXANDER: I'm talking about -- okay.

12 Let me try to get to that a little bit.

13 Q (By Mr. Alexander) Does -- when I say Lawson,
14 Mr. Rapp, I think wants me maybe to give a little more
15 detail about who at Lawson has knowledge, okay? So
16 when I talk about Lawson, I want to know if when you
17 were at Lawson from 2012 to 2013 as a plumbing foreman,
18 did you have some supervisors?

19 A Yes, sir.

20 Q And who were the people that were your
21 supervisors that you would report to?

22 A Field supervisor would be Ottie Rich.

23 Plumbing manager would be Matthew Poole.

24 Q Okay. And did those people as well as other
25 managers or supervisors at Lawson have knowledge that

1 you were using the truck for personal use?

2 A Yes, sir.

3 Q Now, I saw some -- I think I saw some things
4 in your Interrogatories about that. How -- can you
5 provide me an example or two of how either Mr. Poole or
6 Mr. Rich or other individuals who worked at Lawson were
7 aware that you would use the truck for personal use?

8 A Yes, sir, I can.

9 Q Okay. Tell me a few.

10 A For instance, I was building some porches on
11 some trailers that my daddy owns on the weekend, and
12 moving around some lumber, I accidentally backed into
13 one of the decks with the Lawson's truck, put a pretty
14 good dent about the rear fender.

15 Q Okay.

16 A Monday morning, I went straight in, told my
17 supervisor, Ottie Rich. We stepped out and looked at
18 the truck. He said, not a problem, don't worry about
19 it.

20 Q Okay. Did you tell him that you were using it
21 to build a deck --

22 A Absolutely, yes, sir.

23 Q -- over the weekend?

24 A Just as I told you.

25 MR. ALEXANDER: Do you have a few stickers for

1 | me?

2 (Patterson Exhibit 1 was marked for
3 identification.)

4 Q (By Mr. Alexander) I'll show you what I've
5 put as Plaintiff's Exhibit No. 1. And Mr. Patterson,
6 that is a picture of the truck -- my understanding is
7 that's a picture of the truck that you were driving the
8 night of this wreck. Does that look about right to you
9 there at the WalMart?

10 A Yes, sir.

11 Q Okay. Now, if you look, sir, down on the
12 left-hand bumper of the truck, it looks like there's a
13 little bit of a dent. Do you see that?

14 A Yes, sir.

15 Q Is that what you're referring to?

16 A In part, sir, yes, sir.

17 (Patterson Exhibit 2 was marked for
18 identification.)

19 Q (By Mr. Alexander) Okay. I got a couple of
20 more pictures. Let me show you Plaintiff's Exhibit 2.
21 Does that show kind of part of the dent that you're
22 talking about?

25 MR. ALEXANDER: Yes. I'm going to make it a

1 little bit easier, too. I'm going to try to make
2 it easier if I can find a Sharpie.

3 MR. DOLDER: That's fine. It's just the pause
4 in time. I want to refresh him.

5 Q (By Mr. Alexander) All right. So on
6 Plaintiff's Exhibit No. 1, is the dent -- you can see
7 part of the dent. Is that right where my finger is
8 located?

9 A Yes, sir.

10 Q Okay. And have I kind of circled that
11 accurately with the black Sharpie on Plaintiff's
12 Exhibit No. 1?

13 A Yes, sir.

14 Q Okay. Now, on Plaintiff's Exhibit No. 2,
15 that's just a blow up of the same picture, okay? Does
16 it also show part of that dent on Plaintiff's Exhibit
17 No. 2?

18 A In the bumper, yes, sir.

19 Q Okay. And is it where I'm pointing with my
20 finger?

21 A It is.

22 Q And have I circled that correctly with the
23 Sharpie?

24 A A little wide, but yes, sir.

25 MR. ALEXANDER: All right. I got a couple

1 more pictures that might help also.

2 (Patterson Exhibit 3 was marked for
3 identification.)

4 Q (By Mr. Alexander) Okay. I know you got a
5 lot of pictures in front of you there, Mr. Patterson,
6 but I'm going to try to -- as you look at Plaintiff's
7 Exhibit No. 3, there's a picture of the truck on the
8 top and a picture of the truck on the bottom. Are you
9 with me?

10 A Yes, sir.

11 Q Okay. Now, I guess because of the angle, you
12 don't really see that dent on the top picture, do you?

13 A No, sir.

14 Q Okay. But do you see it a little more on
15 the -- on Plaintiff's Exhibit -- on the bottom picture
16 of Plaintiff's Exhibit 3?

17 A I see it clearly, sir.

18 Q I tell you what, since I did a bad job
19 circling, why don't you just circle for me with the
20 Sharpie on Plaintiff's Exhibit Number 3, if you can.

21 MR. DOLDER: Do you feel comfortable doing
22 that?

23 (At this time, the witness complies with
24 request.)

25 MR. ALEXANDER: Perfect.

1 (Patterson Exhibit 4 was marked for
2 identification.)

3 Q (By Mr. Alexander) All right. And then --
4 now, on Plaintiff's Exhibit No. 4, does that further
5 show the damage to the truck that was assigned to you
6 that was a result of your personal use of the truck
7 that you told Mr. Rich about?

8 A That's correct.

9 Q Okay. Now, in addition to telling Mr. Rich
10 about using the truck to build a deck, did you also --
11 I saw something in here about using the truck and
12 showing the picture of using the truck to purchase a
13 four-wheeler for your son?

14 A Repeat that, please.

15 Q Sure. What I'm looking at is some of your
16 Interrogatories, and they make reference to, it looks
17 like, an instant, for example, where you purchased a
18 four-wheeler as a gift for your son and you used
19 Lawson's truck to purchase the four-wheeler and then
20 you sent a picture of the four-wheeler loaded in the
21 truck to Ottie Rich and Matthew Poole and others?

22 A And others, yes, sir.

23 Q Okay. And so when Matthew Poole and Ottie
24 Rich -- did you talk to them about that, too, by any
25 chance? Did you tell them, you know, this is my son's

1 four-wheeler I got for a gift, something like that?

2 A Yes, sir.

3 Q Okay. Did Matthew Poole or Ottie Rich or
4 anybody from Lawson ever tell you, hey, you shouldn't
5 be using that truck for personal use like hauling
6 around a four-wheeler for your son?

7 A No, sir.

8 Q What about things like -- did you use the
9 truck to -- did you ever coach your son in little
10 league sports or anything, coach ball?

11 A Yes, sir.

12 Q Would you take the truck to practice?

13 A Yes, sir.

14 Q Did anybody ever from Lawson tell you that's
15 something you couldn't do?

16 A Never was told that, no, sir.

17 Q Was that something that you attempted to hide
18 from Lawson?

19 A By no means.

20 Q Just pulled the truck up and parked right in
21 front?

22 A That's correct.

23 Q Let me just ask, where would y'all practice?

24 A Some was at the field at Mt. Vernon Elementary
25 Jim Hood Road.

1 Q Uh-huh?

2 A A lot of the games were at Laurel Park and
3 other Hall County sports complexes.

4 Q Sure. And so for example, you would take the
5 truck to Laurel Park for games with your son and just
6 park it in the parking lot at Laurel Park?

7 A Yes, sir.

8 Q I also saw somewhere in here, was there a
9 period of time when you were laid off from Lawson?

10 A Yes, sir. I received temporary layoff with
11 Lawson.

12 Q About when -- can you generally tell me when
13 that occurred?

14 A I'm not understanding.

15 Q That was the second time you were working for
16 Lawson?

17 A Yes, sir.

18 Q And that's when they had assigned you a truck?

19 A Yes, sir.

20 Q Okay. And who talked to you about that, was
21 that Mr. Rich, Mr. Poole?

22 MR. DOLDER: Talked to him about what?

23 MR. ALEXANDER: About being laid off.

24 THE WITNESS: Yes, sir, both, Poole and Rich.

25 Q (By Mr. Alexander) Okay. And for about how

1 long were you laid off?

2 A A couple of weeks, ten days, working days,
3 something like that.

4 Q And what was the purpose of being laid off?

5 A Lack of work.

6 Q Now, during -- so they weren't going to keep
7 paying you during that period of time that you were
8 laid off?

9 A They were offering the temporary layoff so I
10 could draw an unemployment check for the couple of
11 weeks until a job started up.

12 Q Okay. And during that period of time, did you
13 say okay, and give them back the keys to the truck?

14 A No, sir.

15 Q Was there -- did they talk to you about
16 allowing you to continue to use the truck?

17 A Yes, sir.

18 Q What did they tell you?

19 A Take it home, we'll call you in a couple of
20 weeks, be ready to come back to work.

21 Q Were they comfortable with you continuing to
22 use the truck during that period of time until they
23 called you back to work?

24 MR. RAPP: Object to form. The same -- this
25 is the same thing over and over again. How does he

1 know if they were comfortable?

2 Q (By Mr. Alexander) Did they indicate to you
3 that you could continue to use the truck during this
4 period of time that you were being laid off until you
5 came back -- go ahead, take the truck home, you can
6 keep using it until we call you back?

7 A That's correct.

8 Q Okay. So they were aware during this period
9 of time that you were laid off that you were going to
10 be continuing to use that truck?

11 A Yes, sir.

12 Q And they were comfortable with that?

13 MR. RAPP: Object to form, same.

14 THE WITNESS: Yes, sir.

15 Q (By Mr. Alexander) Now, in addition to
16 providing you with a truck, did Lawson also provide
17 trucks or assign trucks, specific trucks to other
18 foremen or supervisors?

19 A Yes, sir, every -- yes, sir, foremen and
20 supervisors have company vehicles.

21 Q Okay. And they were assigned those vehicles
22 like you were assigned the vehicle?

23 MR. RAPP: Object to form.

24 THE WITNESS: Explain that a little bit. I'm
25 almost following you.

1 Q (By Mr. Alexander) Okay, good. Thanks for
2 clarifying that for me. So, I don't know, I saw a list
3 somewhere that there were about maybe a little over 30
4 different vehicles assigned to different people. Does
5 that sound about right to you?

6 A Give or take the time of the year and what
7 kind of work is going on, yes, sir.

8 Q Okay.

9 A It very easily can be 30.

10 Q So Lawson was assigning trucks to specific
11 individuals and it was more than just one or two or
12 three trucks?

13 A Oh, yes, sir.

14 Q It was a whole fleet of trucks?

15 A Fleets.

16 MR. DOLDER: Don't talk over each other.

17 Q (By Mr. Alexander) Okay. And when they
18 were -- are you -- and did you know some of the other
19 people that Lawson had assigned a truck to?

20 A Yes, sir.

21 Q Okay. And from your discussions with those
22 people, did they assign -- did Lawson assign a truck to
23 those other people as a perk of the job like they
24 assigned the truck to you?

25 A Yes, sir.

1 Q And did they also give a number of those
2 individuals cell phones to use?

3 A Yes, sir.

4 Q And did those other field supervisors and
5 foremen who had received cell phones from Lawson, did
6 they use those cell phones for both business purposes
7 and some personal calls?

8 A I did.

9 Q Okay. Do you know if they did?

10 A I know we had used -- I had spoken to other
11 foremen using company phones and it was after hours and
12 had nothing to do with work. Other than that, I
13 couldn't tell you. I don't really know what other
14 people do.

15 Q Okay. And let me ask you this: The other
16 folks that Lawson had assigned trucks to other than
17 you, did Lawson also give them permission to use the
18 truck for some personal use as well as business use?

19 A Yes, sir.

20 Q And was Lawson okay with its drivers of those
21 trucks specifically assigned to them using the truck
22 for both business and some personal use?

23 MR. RAPP: Object to form.

24 MR. ALEXANDER: You can answer the question.

25 THE WITNESS: Yes, sir.

1 Q (By Mr. Alexander) Okay. And are you aware
2 of some examples when Lawson knew that other folks were
3 using the truck for personal use?

4 A Yes, sir.

5 Q Okay. Give me a for example.

6 A Of other trucks being used?

7 Q Sure.

8 A For instance, a fellow foreman in the plumbing
9 field needed to borrow a tiller one spring --

10 Q Okay.

11 A -- to tiller up his garden. My daddy has all
12 kinds of stuff like that. Called my dad, dad said he's
13 welcome, come get it. He come got it in Lawson's
14 truck, used it all weekend, brought it back on Sunday
15 afternoon in a Lawson's truck.

16 Q Okay. Did you -- I saw something about did
17 you ever see Matthew Poole -- I saw something about
18 after hours in Dahlonega in a Lawson vehicle.

19 A No, sir, not Matthew Poole for sure.

20 Q Okay. Did you see somebody -- let me ask you
21 this: I saw something in one of your responses that
22 said that you recall seeing Matthew Poole at a
23 drive-thru restaurant.

24 A Oh, yes, sir.

25 Q Okay. And at the time, were you in a Lawson

1 vehicle after hours and Matthew saw you in Dahlonega at
2 the drive-thru?

3 A We were in Gainesville.

4 Q Okay.

5 A And yes, sir.

6 Q Okay. So it was in Gainesville?

7 A Yes, sir.

8 Q But it was not for anything that had to do
9 with work?

10 A I was getting a bucket of chicken at Kentucky
11 Fried Chicken.

12 Q All right. Was Matthew Poole at the Kentucky
13 Fried Chicken also?

14 A No, sir.

15 Q Where did he see you?

16 A He was coming down the boulevard there.

17 Q Did he see you? I mean, how do you know he
18 saw you?

19 A We have Nextel radios.

20 Q Okay.

21 A Chirped up, what are you doing, boy; getting a
22 bucket of chicken, coming from my daddy's, heading to
23 the house to feed the kids; see you in the morning.

24 Q Did you see him as he went by?

25 A I did.

1 Q Was he also in a Lawson truck?

2 A Yes, sir.

3 Q Did other Lawson employees use trucks for
4 personal use like levelling ground for a Matthew Poole?

5 A Yes, sir.

6 Q And maybe even I saw something about burying
7 animals.

8 A Yes, sir.

9 Q Did Lawson have a problem with any of those
10 employees doing that?

11 MR. RAPP: Object to form.

12 THE WITNESS: Not that I'm aware of, no, sir.

13 Q (By Mr. Alexander) Did anybody at Lawson ever
14 tell you that you could not use the truck that was
15 assigned to you for personal use?

16 A No, sir.

17 Q Are you aware, Mr. Patterson, now, as we sit
18 here now that Lawson is saying it was against their
19 policy for you to use their truck for personal use at
20 any time unless approval had been granted by Lawson's
21 management?

22 A I haven't had any contact with Lawson's
23 manager.

24 Q Okay. But are you aware that Lawson is saying
25 now, our position is that Mr. Patterson never had

1 permission to use the truck for personal use?

2 MR. RAPP: Object to form.

3 THE WITNESS: Clarify that one more time.

4 Q (By Mr. Alexander) I'll try.

5 A Okay.

6 Q Okay. Now, I know we've talked about -- it
7 seems like you've indicated to me that you had used the
8 truck assigned to you for personal use and that other
9 people at Lawson had used trucks for personal use,
10 okay. Now that all this litigation has begun and even
11 some of the litigation that happened or lawsuit that
12 happened after this wreck occurred, okay, are you aware
13 now that Lawson is taking a position that it was
14 against their policy to use their truck for your
15 personal use at any time unless you had gotten some
16 prior approval from Lawson's manager?

17 A Is that what they're saying?

18 Q I think that's what they're saying. I'm
19 asking you if you understand that that's what they're
20 saying?

21 A I understand that, but I haven't spoke with
22 any office management. I haven't spoke with anybody,
23 them telling me that, but it's obvious that that's what
24 they're trying to say, yes, sir.

25 Q Okay. But no one -- had anybody before this

1 wreck ever communicated that policy to you?

2 A It never came up.

3 Q And to the extent, do you know was that
4 something that people who were assigned trucks were
5 following? I can tell by the look on your face you
6 didn't quite follow that one.

7 MR. DOLDER: Yeah. I think -- I'm going to
8 object on vagueness. It's the word "that".

9 MR. ALEXANDER: All right.

10 Q (By Mr. Alexander) No one ever communicated
11 that policy to you?

12 MR. DOLDER: Asked and answered.

13 MR. ALEXANDER: All right.

14 Q (By Mr. Alexander) Well, let me ask you this:
15 Did you occasionally have safety talks with the
16 management or supervisors with Lawson where they would
17 go over some of your -- some of their policies with
18 you?

19 A Yes, sir.

20 Q Okay. And I think I saw where you had to sign
21 like a little sign-in form when you have a safety talk?

22 A That's correct, job box safety talks.

23 Q All right. And it looks like I had some of
24 them were on eye protection and hand operated tools and
25 back injury prevention. Does that sound familiar to

1 you?

2 A Yes, sir.

3 Q During any of those safety box talks, did
4 anybody from Lawson ever express to you that anything
5 about your use of the truck for -- that you couldn't
6 use the truck for personal use?

7 A In a safety meeting?

8 Q Yes, sir.

9 A No, sir.

10 Q Were there any systems in place in Lawson if
11 you had to get approval to use the truck for personal
12 use, were there any systems in place that -- how you
13 would go about doing that?

14 A Not that I'm aware of, no, sir.

15 Q Was there any designated person that you were
16 aware of that you were supposed to contact if you
17 wanted to use the truck for personal use?

18 A No, sir.

19 Q Was there any list or log that you were aware
20 of at Lawson that would identify if and when Lawson
21 would give permission to use the truck for personal
22 use?

23 A No, sir.

24 Q All right. Are you good, Mr. Patterson?

25 A I'm good.

1 Q All right. When you first started with Lawson
2 in June of 2012, okay, during that initial period of
3 time when you started working as a plumbing foreman,
4 that's the period of time I want to talk about. Did
5 either Ottie Rich or Matthew Poole have you sign a
6 bunch of paperwork before you started for HR purposes?

7 A Yes, sir.

8 Q Okay. Do you recall all the different things
9 that they wanted you to sign?

10 A I do not.

11 Q Let me show you what I'm going to mark as
12 Plaintiff's Exhibit No. 5. I got one for everybody.

13 (Patterson Exhibit 5 was marked for
14 identification.)

15 MR. DOLDER: There we go. Feel free to take
16 your time and look at that before you answer any
17 questions.

18 Q (By Mr. Alexander) I guess my first question
19 is, Mr. Patterson, do you remember if -- this looks
20 like it was dated June 13, 2012. Do you know if this
21 was one of the papers that either Mr. Rich or Mr. Poole
22 wanted you to sign for HR purposes?

23 A That's my signature, yes, sir.

24 Q And so you think this may have been one of the
25 many pieces of paper that they had you fill out?

1 A It looks like one, yes, sir.

2 Q Now, there' -- in the second paragraph on that
3 page, it says: I have read the policy manual and
4 safety manual belonging to Lawson Air Conditioning and
5 Plumbing, Inc. Do you see that?

6 A I do.

7 Q Prior to June 13, 2012, did Lawson provide you
8 with any policy manual or safety manual to review and
9 read?

10 A I don't recall ever seeing a safety manual
11 from Lawson's Heating and Air.

12 Q Did -- so they didn't give you one and say,
13 hey, go back in this room and take a couple of hours or
14 however long you need to go read over this policy
15 manual?

16 A No, sir.

17 Q You just sort of signed some paperwork and
18 went to work?

19 A That's correct.

20 Q Did they give you any kind of safety manual or
21 policy to take home?

22 A No, sir.

23 Q Said here, take this home and read over it?

24 A No, sir.

25 Q When you were interviewed by Matthew Poole,

1 did Matthew Poole sit down with you and go over any
2 policy manual page by page as to what all the different
3 policies of Lawson were?

4 A No, sir, he did not.

5 Q When you were initially hired by Lawson, did
6 Matthew Poole, as it relates to the truck, go over with
7 you any policies to indicate to you that you could not
8 use the truck for personal use?

9 A No, sir.

10 Q Did he ever tell you at any time that you
11 could not take the truck to WalMart if you wanted to?

12 A He did not.

13 MR. ALEXANDER: I tell you what, we've been
14 going at it for about 45 minutes. Let's take a
15 little break.

16 VIDEO TECHNICIAN: Going off the record. The
17 time is 10:46 a.m.

18 (Whereupon, there was a recess from 10:46 a.m.
19 to 10:56 a.m.)

20 VIDEO TECHNICIAN: We're going back on the
21 record. The time is 10:56 a.m. Please continue.

22 Q (By Mr. Alexander) Okay. Mr. Patterson, I
23 want to talk a little bit about the day of the accident
24 at WalMart, okay? At the time that this accident took
25 place that involved the Dunns at WalMart, were you on

1 any kind of painkillers?

2 A Yes, sir.

3 Q And why was that?

4 A I had broke -- I had what's called a boxer's
5 fracture in my hand. I injured my hand and was
6 prescribed from the doctor the medication.

7 Q And so the medications that you were on were
8 medications that had been prescribed to you?

9 A Yes, sir.

10 Q Had you taken those medications the day that
11 this wreck occurred --

12 A Yes, sir.

13 Q -- or this accident occurred?

14 Did you think that those medications impaired
15 your ability to drive?

16 A No, sir.

17 Q Why did you plead guilty to the DUI offense?

18 A Because the accident was a hundred percent my
19 fault.

20 Q After the accident happened, okay, did you
21 speak with anybody from Lawson that weekend?

22 A No, sir.

23 Q Then did you go into work that Monday?

24 A I did not.

25 Q Why not?

1 A I was ashamed.

2 Q Now, did you speak with --

3 MR. DOLDER: Hold on one second.

4 MR. ALEXANDER: Sure.

5 THE WITNESS: It's good.

6 Q (By Mr. Alexander) Did you speak with anybody
7 from Lawson over the phone maybe the week after the
8 wreck happened?

9 A Over the phone?

10 Q Yes, sir.

11 A I know I did in person.

12 Q And was that Ottie Rich?

13 A Yes, sir.

14 Q Okay. Now, I'm going to tell you this because
15 I don't want you to think I'm trying to trick you,
16 okay. In the lawsuit that my clients filed against you
17 and Lawson, we talked to Ottie Rich and we asked some
18 questions and went through this process just like we're
19 doing with you, and we asked him if he talked to you
20 after this wreck occurred. Are you with me?

21 A Yes, sir.

22 Q Okay. And he said he did, he spoke with you
23 at your home?

24 A That's correct.

25 Q And then I asked him -- I talked to him about

1 when that took place, okay, and he indicated to me that
2 as best he could determine, that if the wreck happened
3 on Friday, June 7th -- are you with me?

4 A I'm with you.

5 Q -- then there -- the next week is that Monday,
6 June 10th, and Mr. Rich indicated to me that as best he
7 could tell, he caught up to you for the first time
8 about a week and a half to two weeks after June 10th.
9 Does that sound about right to you?

10 MR. DOLDER: After June 10th or June 7th?

11 MR. ALEXANDER: After June 10th.

12 THE WITNESS: That sounds a little stretched
13 in days to my recollection.

14 Q (By Mr. Alexander) Okay. What's your
15 recollection?

16 A I would say, you know, my best recollection
17 would be that it was at the end of the following week.

18 Q Okay. So sometime the end of the week of
19 June 10th, as best you can recall?

20 A I could be wrong --

21 Q All right.

22 A -- but yes.

23 Q So it was -- whether you go by Mr. Rich's
24 recollection or your recollection, it was a good week
25 after the wreck took place that you first spoke to

1 somebody in person from Lawson?

2 A Repeat that, please.

3 Q Yeah. And I'm sorry, I may be trying to
4 confuse you. Right now I'm just talking about the
5 timing.

6 A Uh-huh.

7 Q Okay. Let me back up each before I get to the
8 timing. The first person that you spoke to from Lawson
9 after the wreck was Ottie Rich, as I understand it?

10 A Yes, sir.

11 Q And that's when he came out to your house?

12 A Yes, sir.

13 Q Okay. And as best you can recall, that would
14 have taken place sometime in the latter part of the
15 week after the wreck occurred?

16 A Yes, sir.

17 Q Okay. Now, when he came out to your house,
18 did he ask for your phone?

19 A Yes, sir.

20 Q And did you give him your phone?

21 A I did.

22 Q Did he ask for the gas card?

23 A Yes, sir.

24 Q And did you give him the gas card?

25 A I did.

1 Q Did he ask for keys?

2 A Yes, sir.

3 Q And did you give him keys?

4 A I did.

5 Q And was that the first time -- when you met
6 with Ottie Rich, whatever that time was when you gave
7 him the keys and the gas card and the phone, was that
8 the first time that you learned from Lawson that you no
9 longer had permission to drive the truck that had been
10 assigned to you?

11 A I don't remember that being even a topic.

12 Q Okay. But that's -- all right. So that
13 wasn't even discussed?

14 A No, sir.

15 Q All right. While you were working with
16 Lawson, did you have any other accidents in a Lawson
17 vehicle?

18 A Yes, sir.

19 Q And what happened with that? What was the
20 nature of that accident? What was that accident?

21 A What was the incident itself?

22 Q Yes, sir.

23 A I hit a teenager on a skateboard.

24 Q Now, was Lawson's insurance company involved
25 with that?

1 A Yes, sir.

2 Q And did the insurance company as far as you
3 know just handle that for you?

4 A They did.

5 Q Did the insurance company call you then or did
6 they just take care of it?

7 A I spoke with someone from the insurance on the
8 telephone conference call.

9 Q And basically did you just tell them what
10 happened?

11 A I told them my side to the incident, yes, sir.

12 Q And from there, they just handled it?

13 A They handled it.

14 Q Now, in this case, okay -- let me back up.
15 That's not clear.

16 You received -- did you receive -- you
17 received the lawsuit that my firm filed on behalf of
18 the Dunns against you and Lawson, it looks like about
19 April of 2014; does that sound right?

20 A I suppose.

21 Q Okay.

22 MR. DOLDER: Well, don't guess. If you don't
23 know, say you don't know.

24 THE WITNESS: I do not know.

25 Q (By Mr. Alexander) You don't know the date?

1 A I do not.

2 Q Okay. But you remember somebody coming out
3 and giving you a lawsuit?

4 A I don't recall.

5 Q Okay. At some point in time after you had --
6 were gone from Lawson --

7 A Yes, sir.

8 Q -- okay, did you understand that there was a
9 lawsuit against you and Lawson?

10 A Yes, sir.

11 Q And did you understand kind of like the
12 skateboarding event, that Lawson or its insurance
13 company were just going to take care of that for you?

14 A I had no doubt, yes, sir.

15 Q Did anyone from Lawson ever contact you and
16 tell you that they would not take care of that for you?

17 A No, sir.

18 Q Did anybody from an insurance company ever
19 contact you and indicate to you that they would not
20 take care of that for you?

21 A No, sir.

22 Q You were under -- you believe they were just
23 handling it?

24 A Yes, sir.

25 (Patterson Exhibit 6 was marked for

1 identification.)

2 Q (By Mr. Alexander) I'm going to show you a
3 letter that's dated August 22nd, 2013 that indicates
4 it's addressed to you. I just want to ask you a little
5 bit about it, okay? There you go.

6 So if this wreck took place in June of 2013,
7 this letter would have been written maybe a couple
8 months after that, August of 2013. Did you get this
9 letter, what is Exhibit No. 7?

10 MR. DOLDER: I think it's 6.

11 MR. ALEXANDER: I'm sorry, 6.

12 THE WITNESS: I did not receive this in the
13 mail.

14 (Patterson Exhibit 7 was marked for
15 identification.)

16 Q (By Mr. Alexander) Let me show you Exhibit
17 No. 7, which looks like it's a similar letter dated
18 September 13, 2013, about three weeks later.

19 MR. DOLDER: Don't answer any questions on
20 that yet. Do you have another copy?

21 MR. ALEXANDER: Absolutely.

22 MR. DOLDER: Thank you. Let me see real
23 quick.

24 Q (By Mr. Alexander) Did you get a copy of that
25 letter, which is Exhibit No. 7?

1 A No, sir.

2 Q Mr. Patterson, at some point in time, did you
3 learn that the lawsuit that my clients brought against
4 you and Lawson, that Lawson was no longer a party or
5 your participating in that lawsuit?

6 A As far as --

7 Q That lawsuit was gone in the -- that Lawson
8 was gone from the lawsuit and now the lawsuit was just
9 against you?

10 A Yes, sir.

11 Q How did you feel about that?

12 A Not very well.

13 Q What do you mean?

14 A I felt like I was hung out to dry.

15 Q Did anybody from Lawson ever contact you and
16 notify you that they were no longer a part of the
17 lawsuit or were getting out of the lawsuit?

18 A No, sir.

19 Q Did anybody from the insurance company or any
20 insurance company ever contact you and tell you that
21 Lawson was getting out of the lawsuit?

22 A No, sir.

23 Q Or did anybody from the -- well, let me ask
24 you this: After you learned that you were in the
25 lawsuit that my clients brought against you and Lawson

1 now by yourself -- are you with me?

2 A Yes, sir.

3 Q After you became aware of that, did you speak
4 with a lawyer from Atlanta or a lawyer from an
5 insurance company about wanting to represent you?

6 A I did.

7 Q And were you aware that they were hired by the
8 insurance company and wanting to represent you?

9 A Yes, sir.

10 Q And did you agree to have that lawyer
11 represent you?

12 A No, sir.

13 Q And why was that?

14 A Because I didn't trust anybody at that point.

15 Q Did you in the lawsuit that the Dunns brought
16 against you and Lawson that ultimately just became
17 against you, did you participate or go to any hearings
18 or depositions?

19 A No, sir.

20 Q Why not?

21 A Because I was guilty of the accident. I
22 didn't see anything that I could help or hurt.

23 MR. ALEXANDER: I think that's all the
24 questions I have at this time.

25 MR. RAPP: Okay.

1 EXAMINATION

2 BY MR. RAPP:

3 Q Hi, Mr. Patterson, my name is Steve Rapp. I
4 represent Columbia National Insurance Company. I'm
5 going to go back a little bit. Where do you live?

6 A 6933 Keith Road.

7 Q Is that in Gainesville?

8 A It's in Clermont, Georgia.

9 Q Are you employed right now?

10 A I am.

11 Q Where do you work?

12 A Ingram's Plumbing Contractors.

13 Q Where is Ingram located?

14 A Hilton Way, Gainesville, Georgia.

15 Q How long have you been working for Ingram?

16 A Five years, maybe.

17 Q Was it the next job you got out of Lawson?

18 A Yes, sir.

19 Q Same position, are you a plumbing foreman
20 or --

21 A That's correct.

22 Q Do you have a car as part of that, a truck?

23 A Yes, sir, I do.

24 Q Was it -- is it provided by Ingram?

25 A It is.

1 Q What is it?

2 A It's a 2000 -- I not sure the year, maybe '11
3 Chevrolet Silverado.

4 Q Have you had the truck the whole time you
5 worked for Ingram?

6 A Not this particular truck, no, sir.

7 Q But you've had a vehicle the whole time you've
8 worked for them?

9 A I have company vehicle, yes, sir.

10 Q Do you have a personal vehicle, too?

11 A I do.

12 Q What kind of car is that?

13 A It's a 2000 Chevrolet Silverado.

14 Q Did you have the Chevy Silverado when you
15 worked at Lawson?

16 A I did not.

17 Q Did you have a personal vehicle when you
18 worked at Lawson?

19 A We had one vehicle, a family vehicle, yes,
20 sir.

21 Q Is that true for both different times you
22 worked for Lawson?

23 A Excuse me?

24 Q Did you have just one family vehicle during
25 both times that you were employed by Lawson?

1 A I don't recall in '04. I don't recall.

2 Q How long did you work for Lawson the first
3 time around in '04?

4 A Less than a year.

5 Q Okay. Are you married?

6 A Yes, sir.

7 Q What's your wife's name?

8 A Michelle.

9 Q How long have y'all been married?

10 A Almost 15 years.

11 MR. DOLDER: Just don't ask him his
12 anniversary.

13 Q (By Mr. Rapp) Do you have any kids?

14 A Yes, sir, we do?

15 Q How many?

16 A Four.

17 Q What are their ages?

18 A 15, 13, 12, and 5.

19 Q Busy house. So we talked about when you were
20 hired by Lawson the second time.

21 (Patterson Exhibit 8 was marked for
22 identification.)

23 MR. DOLDER: Could we go off the record for
24 one second.

25 MR. RAPP: Sure.

1 VIDEO TECHNICIAN: We're going off the record.

2 The time is 11:16 a.m.

3 (Discussion ensued off the record.)

4 VIDEO TECHNICIAN: We're going back on the
5 record at 11:17 a.m. Please continue.

6 Q (By Mr. Rapp) Mr. Patterson, you received
7 this the day you were hired in 2012, right?

8 A This?

9 Q Yes.

10 A I've never seen this.

11 Q You didn't go over it with Mr. Rich the day
12 you were hired?

13 A No, sir.

14 Q Didn't go over it with Mr. Poole?

15 A No, sir.

16 Q If Mr. Poole said he went over it with you,
17 you think he's lying?

18 A Yes, sir.

19 Q If you'll go down, see at the bottom right,
20 there's a bunch of numbers that say CP and then there's
21 numbers after it. If you'll go to the one that ends
22 700, CP00700. Do you see down there number H or letter
23 H, excuse me?

24 A Yes, sir.

25 Q And the first sentence says company trucks

1 will not be used for personal use at any time unless
2 approval has been granted my Lawson Air Conditioning
3 and Plumbing management. Is that what if says?

4 A It's what it says.

5 Q Your testimony today under oath is that you've
6 never seen this document before?

7 A I do not recall ever seeing this -- handed
8 this.

9 Q You don't remember it, but it doesn't mean you
10 may not have had it, right?

11 MR. ALEXANDER: I object.

12 THE WITNESS: No, sir, I've never --

13 MR. DOLDER: Yeah, talking over each other.

14 MR. RAPP: Are you objecting?

15 MR. ALEXANDER: Yes. I object to it because I
16 think you guys are both talking at the same time.
17 I just want to make sure we had a clear record.

18 Q (By Mr. Rapp) You don't remember receiving
19 this, right?

20 A That's correct.

21 Q But it's possible that you received it, right?

22 A I have never seen this.

23 Q But it's possible you received it, right?

24 A No, sir.

25 MR. DOLDER: Objection. Asked and answered.

1 You're badgering the witness.

2 Q (By Mr. Rapp) Mr. Alexander asked you about
3 the big stack of papers you got, right, and you were
4 just flipping through them the day you were hired. Do
5 you remember that?

6 A Yes, sir.

7 Q It's not possible that this was in that stack
8 of papers?

9 A No, sir.

10 Q You're sure about that?

11 A I'm sure.

12 Q All right. I'd like to get back to Exhibit 5,
13 if you can pull that out of your stack. All right. Do
14 you see the second paragraph there that says I have
15 read the policy manual and safety manual belonging to
16 Lawson Air Conditioning and Plumbing, Inc., do you see
17 that?

18 A Yes, sir.

19 Q And that's your signature, right?

20 A Yes, sir.

21 Q So you're telling me you lied when you signed
22 that piece of paper?

23 A No, sir.

24 Q Well, it says I have read the policy manual
25 and safety manage belonging to Lawson Air Conditioning

1 and Plumbing. You're telling me you haven't, right?

2 A That's correct.

3 Q So that's not true, you had not read the
4 policy manual and safety manual, right?

5 A That's correct.

6 Q But you signed the paper anyway?

7 A That's correct.

8 Q Okay. If you had a family vehicle when you
9 were hired by Lawson the second time, when would you
10 use it?

11 A It was my wife's car.

12 Q So you drove the Lawson truck exclusively?

13 A Pretty much.

14 Q Did you ever drive your wife's car?

15 A Very seldom.

16 Q There was some testimony earlier about your
17 cell phone that you were provided by Lawson. Do you
18 remember that?

19 A Yes, sir.

20 Q And you said Lawson knew that you used it for
21 personal calls because of the numbers on your cell
22 phone bill?

23 A Partly, yes, sir.

24 Q Okay. And how would Lawson know what numbers
25 were personal and what weren't?

1 A If a bill come in that was extremely high, we
2 would critique it.

3 Q We, as who?

4 A Lawson's.

5 Q Who at Lawson?

6 A Management.

7 Q Okay. Did you ever --

8 A Matthew Poole specifically.

9 Q Did you ever critique a bill with Mr. Poole?

10 A Not with him, but associated with the bill,
11 yes, sir.

12 Q And that was your cell phone bill?

13 A Yes, sir.

14 Q And was there any discussion during that time
15 about you making personal calls on it?

16 A The discussion was it needs to calm down.

17 Q Did you tell him which numbers were personal
18 and which were work numbers?

19 A No, sir.

20 Q Did you tell him that there were personal
21 calls included in that bill?

22 A Yes, sir.

23 Q You testified earlier that someone told you to
24 treat the vehicle as your own. Do you remember that?

25 A Testifying earlier, yes, sir.

1 Q Do you remember saying that someone at Lawson
2 told you that you were to treat the truck as your own?

3 A Yes. We were to treat the trucks with respect
4 as if they were our own, yes, sir.

5 Q Okay. That's what they said, treat the
6 vehicle with respect as if they were your own?

7 A Yes, sir.

8 Q Okay. And who told you that?

9 A Lawson's.

10 Q Which person at Lawson?

11 A I don't recall.

12 Q Do you remember when that statement was made?

13 A I do not.

14 Q Was it the first time you worked for Lawson or
15 the second, any idea?

16 MR. ALEXANDER: The first time he didn't have
17 a vehicle, I thought.

18 MR. RAPP: That doesn't matter.

19 THE WITNESS: I don't recall.

20 Q (By Mr. Rapp) Okay. You also testified that
21 someone at Lawson gave you permission to use the truck
22 for personal use. Do you remember that?

23 A Yes, sir.

24 Q Who told you that?

25 A Matthew Poole at the point of hiring. That

1 was a condition of me signing on at a lower rate per
2 hour.

3 Q So Matthew Poole told you that you had
4 permission to use the truck for personal and work use?

5 A Yes, sir.

6 Q He used those words?

7 A I don't recall those words.

8 Q Do you recall what he said?

9 A I do not.

10 Q And that was sometime around when you got
11 hired?

12 A That was the day of the interview, yes, sir.

13 Q Okay. Why do you think that he gave you
14 permission to use it for personal use when you don't
15 know what he said?

16 A Because it was as a perk of the job.

17 Q So you interpreted the fact that the car --
18 the truck was given to you as a perk of the job as if
19 you could use it for personal use?

20 A No, sir. I didn't interpret anything. That's
21 the way it is.

22 Q Did anyone ever tell you that?

23 A Yes, sir.

24 Q Mr. Poole told you?

25 A Repeat.

1 Q Mr. Poole told you that?

2 A Told me what, sir?

3 Q That you could use the truck for personal use?

4 A Yes, sir.

5 Q Okay. But you don't remember what he said?

6 A Not specifically to swear to, no, sir.

7 Q But you're certain that he gave you permission
8 for personal use the day you were hired?

9 A Yes, sir. I was given the truck the day of
10 the interview right off the bat, no --

11 Q I understand.

12 MR. DOLDER: He's not -- are you finished with
13 your answer?

14 THE WITNESS: No, sir.

15 MR. DOLDER: Please finish.

16 THE WITNESS: No, you know, probationary
17 period to see if you're up to the par of the job or
18 trustworthy or nothing like that. I was very known
19 with the company and with the employees and
20 management throughout the field of the company,
21 very familiar.

22 Q (By Mr. Rapp) I understand that. I've heard
23 you were a great employee, I think is what some of the
24 guys testified to.

25 So I understand that on the day you were

1 hired, you were given the keys and given a truck and
2 told you could go, but I'm still trying to get what was
3 said on that day about permission to use the truck for
4 personal use, not what was done, what was said. Does
5 that make sense?

6 A Yes, sir.

7 MR. DOLDER: Objection. Asked and answered.

8 Go ahead.

9 Q (By Mr. Rapp) Okay. So what was said that
10 day? Not that someone gave you the keys or gave you
11 the truck or everybody knew you were a good employee.
12 Who told you you had permission to use it for personal
13 use?

14 MR. DOLDER: Objection. Compound.

15 MR. RAPP: You can answer.

16 THE WITNESS: I don't recall.

17 Q (By Mr. Rapp) You testified that you drove
18 your truck to your kids' sporting events. Do you
19 remember that?

20 A Yes, sir.

21 Q Do you know if anyone from Lawson ever saw you
22 drive your truck to a sporting event?

23 A Not specifically, I do not.

24 Q There's some testimony that you were laid off
25 from Lawson for ten days when Lawson had a lack of

1 work.

2 A The ten days could have been a little more.

3 I'm not sure exactly -- recalling the exact amount of
4 days, but yes, sir.

5 Q Of some period of time?

6 A Yes, sir.

7 Q And you testified that you were allowed to use
8 your truck during that time frame?

9 A Yes, sir.

10 Q Who did you talk to about using your truck
11 during that time?

12 A Matthew Poole.

13 Q And what did Mr. Poole tell you?

14 A That we were going to have to take a temporary
15 layoff, set you up to draw unemployment until the job
16 kicks off, take the truck home, be ready to come back
17 to work when the job kicks off.

18 Q Oh, he didn't tell you -- all he told you was
19 to take the truck home, right?

20 A I don't recall exactly his words.

21 Q He didn't say anything else other than what
22 you just told me, right?

23 MR. DOLDER: Asked and answered.

24 (Patterson Exhibit 9 was marked for
25 identification.)

1 Q (By Mr. Rapp) Do You want to take a minute to
2 look through. If you're ready, I'm ready.

3 A Let's do it.

4 Q Okay. Exhibit 9 is responses to
5 Interrogatories, which are questions that we can ask in
6 written form, and these are your responses to those,
7 okay?

8 A Yes, sir.

9 Q Will you look through these and tell me if
10 you've ever seen this document before?

11 A Yes, sir, I have.

12 Q Okay. Did you help answer the questions?

13 A Yes, sir. I just -- I've read through it and
14 I've seen some about everything, but it's a lot of
15 legal hogwash. I don't know how to really --

16 Q It's hard to read, isn't it?

17 A Yes, sir.

18 Q Do you think you saw these before April 5th of
19 this year?

20 A April 5th of this year, no, sir.

21 Q You saw them recently?

22 A Yes, sir.

23 Q Do you remember giving -- never mind. Never
24 mind. I'm not going to ask you that.

25 Will you go to page 3 of 30, please. Are you

1 there with me?

2 A Yes, sir.

3 Q Okay. Let's start from the top. The second
4 sentence says: Lawson personnel and management saw
5 Mr. Patterson using the truck during nonworking hours
6 from time to time. Do you see that?

7 A I do.

8 Q And then after it, there's an example. Do you
9 see that?

10 A I see it says for example, yes, sir.

11 Q Okay. All right. Well -- so what I want to
12 do is I want to go through these, but I wanted to know
13 who saw you using the truck during nonworking hours and
14 when.

15 A Okay.

16 Q So here's what I'm going do. I'm going to go
17 through some of these examples on here and then I'd
18 like to know if there are other ones, okay, other
19 examples, all right?

20 So the first one, it says: For example, he
21 recalled seeing Matthew Poole at a drive-thru
22 restaurant after work hours. We talked about that,
23 right? That was when you were getting the bucket of
24 chicken?

25 A It was mentioned, yes, sir.

1 Q Okay. And that's the incident that's
2 referenced in that sentence, right?

3 A I suppose, yes, sir.

4 Q And that was Mr. Poole that saw you?

5 A Yes, sir.

6 Q Mr. Poole wouldn't know if you had permission
7 to use the truck to go get a bucket of chicken, would
8 he?

9 A I can't answer that. I'm not sure.

10 Q The next one says: Another time he used the
11 truck to go on the weekend to go to Dahlonega on
12 personal business and happened to see another member of
13 management.

14 A Yes, sir.

15 Q Who was the member of management you saw?

16 A I do not recall.

17 Q Do you know when that was?

18 A It would be too vague of a guess, no, sir.

19 Q Did -- well, if you don't know the person or
20 the time, I'm assuming you don't know if that person
21 actually saw you?

22 A I couldn't tell you if he saw me. I wouldn't
23 -- no, sir, I couldn't know if you told me.

24 Q And you said he was driving a Lawson vehicle
25 too?

1 A Yes, sir.

2 Q The same kind of truck?

3 A No, sir.

4 Q Different?

5 A Yes, sir.

6 Q Is it possible that he had permission to drive
7 his truck to Dahlonega on personal business?

8 A I don't -- I can't answer that.

9 Q It's possible, right?

10 A You said that.

11 Q Well, you would agree with me, right, he could
12 have asked and received permission from someone at
13 Lawson?

14 A I guess.

15 Q The next one is -- it says: Lawson laid off
16 Mr. Patterson. That's what we just talked about,
17 right?

18 A Yes, sir.

19 Q The next one says -- that I want to go to,
20 the second sentence of the next paragraph, it says:
21 Mr. Patterson told Lawson personnel and management that
22 he used the truck for personal purposes. And then the
23 first example under it is the four-wheeler discussion
24 that you had with Mr. Alexander. Do you remember that?

25 A I do.

1 Q Okay. So do you know when that occurred?

2 A I do.

3 Q When was that?

4 A It was in the two weeks of Christmas Day.

5 Q In 2012? It would have to be '12, right?

6 A It would have to be, yes, sir.

7 Q Did you actually talk to anyone about it or
8 did you just send them a picture like it says here?

9 A There was text along with a multimedia.

10 Q So you sent a text to someone at Lawson?

11 A To everybody in the plumbing division.

12 Q Okay. And would that have included Mr. Rich
13 and Mr. Poole?

14 A Yes, sir.

15 Q Did you send a picture of the four-wheeler on
16 the truck?

17 A Yes, sir.

18 Q What did you say in the text?

19 A I don't recall, something about what I got for
20 Jay Beau for Christmas.

21 Q Is Jay Beau your son?

22 A That's my middle boy, yes, sir.

23 Q Okay. Did Mr. Rich or Mr. Poole respond to
24 the text?

25 A I'm sure they -- yes, sir.

1 Q Do you remember what they wrote?

2 A Something in regards to great job, Merry
3 Christmas, have a good holiday, and that's, you know,
4 vague memory.

5 Q Next example there is what you talked about
6 earlier about helping do some work on your dad's porch.
7 Do you see that?

8 A Yes, sir.

9 Q And you took the truck into work and showed
10 Mr. Rich the dent, right?

11 A I sure did.

12 Q And he said don't worry about it?

13 A He sure did.

14 Q Don't worry about the dent, right?

15 A No problem.

16 Q Any other examples of Lawson personnel and
17 management seeing you using the truck during nonworking
18 hours from time to time?

19 A No, sir.

20 Q There's -- on the next page, on page 4, it
21 says that you saw and had knowledge of others at Lawson
22 using Lawson vehicles for personal purposes. Do you
23 see that?

24 A I see it.

25 Q And then it says, for example, James Brown

1 uses Lawson truck on a Saturday to borrow a tiller from
2 Mr. Patterson's dad. Do you see that?

3 A Yes, sir.

4 Q Do you know one way or the other if James
5 Brown had permission from Lawson management to use the
6 truck that day?

7 A I do not.

8 Q The next one says Juan used his Lawson truck
9 to borrow Lawson's tractor to level ground for his own
10 Matthew Poole. Do you know when that occurred?

11 A No, sir.

12 Q Do you know one way or the other if Juan had
13 permission from management at Lawson to use the tractor
14 to level the ground for his Matthew Poole?

15 A I do not.

16 Q And the next one says Dusty Bryson used Lawson
17 vehicle to bury dead animals. I have to ask how did he
18 do that?

19 A Yes, sir. Mr. Jeff Dale was a big manager,
20 probably a vice-president at the time at Lawson's, had
21 some, I want to say it's Billy goats, lambs something.
22 One passed and he wanted to dispose of the carcass
23 before his child, if I remember correctly, daughter,
24 somebody seen it. So he paid Dusty to use the company
25 vehicle and the company equipment to go bury it on his

1 property.

2 Q And same question as the other ones, do you
3 know one way or the other if Dusty got permission from
4 someone at Lawson management to use the vehicles to do
5 the burying?

6 A No, sir, I don't know.

7 Q Are there any other examples of Lawson
8 employees using their vehicle for personal use that we
9 hadn't just gone over that you can think of?

10 A No, sir.

11 Q You mentioned earlier that on the day of the
12 accident, you were taking medication. Do you know what
13 the medication was?

14 A I don't recall. It was -- no, I don't.

15 Q You said it was to help you with a boxer's
16 fracture?

17 A That's what -- yes, that was the jury.

18 Q How did you get the boxer's fracture?

19 A I punched a pine tree.

20 Q Why did you do that?

21 A I can't recall.

22 Q After the accident on June 7th, 2013, did you
23 still take that medication?

24 A I don't recall. Yes, sir.

25 Q Do you know how long you took it?

1 A No, sir.

2 Q Do you think it was weeks or months or --

3 A No, sir.

4 Q -- you don't know?

5 A No, sir. It wouldn't have been months.

6 Q Just till your hand healed up?

7 A Yeah. Till I followed up with a doctor, yes,
8 sir.

9 Q The accident happened June 7th, 2013, right?

10 A Yes, sir.

11 Q That was a Friday night?

12 A Yes, sir.

13 Q Earlier that day, you were working for Lawson
14 on a job at North Hall High School, right?

15 A I believe so, yes, sir.

16 Q And you would normally get to work about 7:00;
17 is that right?

18 A No, sir.

19 Q What time did you normally get to work?

20 A I was never later than a quarter till early.

21 Q 6:45?

22 A Minimum, latest.

23 Q So you worked till 3:30?

24 A If that -- yes, sir, that's the general hours.

25 Q So the day of the accident, 6:45 to 3:30 or

1 4:00, is that about right?

2 A That job was on a big push. That job was
3 requiring a lot of man hours. I can't answer that. I
4 would have to pull the record on that.

5 Q If the record show that you worked for nine
6 hours that day, would that be about right?

7 A Yes, sir.

8 Q And when you got done, you went and picked up
9 the check, right?

10 A Yes, sir.

11 Q Did you get paid every Friday or every other
12 Friday?

13 A Weekly.

14 Q Okay. So on Fridays when you got done work,
15 did you always go grab your check?

16 A Yes, sir, or if we was pulling long hours,
17 they had been brought to me.

18 Q Who did you pick up your check from?

19 A It's the office.

20 Q Okay. Accounting department or something?

21 A There's mailboxes, assigned mailboxes.

22 Q So when you got finished with the job on
23 June 7th, you drove back to Lawson's office?

24 A I'm not -- I can't recall. It could have been
25 a day that they were brought to us. I remember that

1 job now. It was a very pressed job.

2 Q So it's possible someone brought you your
3 check?

4 A It's possible, yes, sir.

5 Q Where did you go after you got your check that
6 day?

7 A I don't recall.

8 Q Did you eat dinner that night?

9 A Most likely, yes.

10 Q Do you know where?

11 A I do not.

12 Q At some point you picked your son up, right?

13 A That's correct.

14 Q Do you know where you picked him up?

15 A Our home.

16 Q So you went home at some point?

17 A Yes, sir.

18 Q But not sure when?

19 A No, sir.

20 Q Why did you go pick up your son?

21 A No specific answer.

22 Q You don't know?

23 A He's my boy. They stay with me all the time.

24 It could have been anything.

25 Q You just took him to ride with you?

1 A Yes, sir.

2 Q Who how old was he then?

3 A How many years has that been now?

4 Q A little over five.

5 A So he was around ten.

6 Q Okay. And where did you go after you got your
7 son and left home?

8 A Oh, yes, sir, we went and we did, that is
9 correct. We ate at Arby's that evening, that is
10 correct.

11 Q So just you and your son or the whole family?

12 A Just me and my son.

13 Q So you left work, at some point went home,
14 picked up your son and went to Arby's for dinner?

15 A Yes, sir.

16 Q What about after Arby's, where did you go?

17 A To WalMart.

18 Q Okay. Did you go in WalMart?

19 A No. We hadn't made it in, no, sir.

20 Q Okay. And in the video I see you were kind of
21 parked in front of the WalMart.

22 A Yes, sir.

23 Q What were you doing kind of idle there?

24 A I was talking with my son and, you know,
25 conversating with him, figuring out -- he was wanting a

1 particular -- I can't even remember what brand it was,
2 Big Tens, some kind of hot topic toy at the time, you
3 know.

4 Q So you had gone to WalMart with your son to
5 get him a toy or something?

6 A That's correct, a reward.

Q But you hadn't parked the car yet?

8 A Not parked and got out, no, sir.

9 Q You said it was a reward for him?

10 A Yes, sir.

11 Q What had he done?

12 A There's no telling. They're so great. They
13 get them all the time. I mean, you could file it.

14 Q Okay. And when you hit the Dunns, were you
15 going to park?

16 A Yes, sir.

17 Q And you hit them right around 10:55 at night;
18 is that right?

19 A If that's the record, yes, sir.

20 Q I can get it real quick.

21 (Patterson Exhibit 10 was marked for
22 identification.)

23 Q (By Mr. Rapp) I'm going to hand you
24 Exhibit 10. This is the accident report from that
25 night?

1 A Yes, sir.

2 Q Okay. I just want to -- if you look up the
3 top here, there's a thing that says time. Do you see
4 it says 22:55?

5 A Yes, sir.

6 Q So 10:55 at night. Does that refresh your
7 recollection as to when the accident occurred?

8 A I would say it was earlier than that, but I
9 guess that might be what time that they put down. I'm
10 not sure.

11 Q If you go to the third page of the accident
12 report, there's a little paragraph at the top, a
13 description. If you don't mind, just read that for me
14 and then I want to ask you a question when you're done
15 reading it, okay?

16 A Okay.

17 Q Is that how you recall the accident happening?

18 A No, sir.

19 Q Tell me what is wrong with that description.

20 A I did not see anybody. It was a very freak
21 accident, and I regret it more than a lot of things in
22 my life.

23 Q Okay. And it says in the description that you
24 were arrested for DUI of drugs. Do you see that?

25 A Yes, sir.

1 Q Were you taken to jail that night?

2 A I was.

3 Q How long were you in jail after that?

4 A Eight hours, approximately.

5 Q Did someone pay a bond to get you out?

6 A That's correct.

7 (Patterson Exhibit 11 was marked for
8 identification.)

9 MR. DOLDER: Oh, I'm sorry.

10 MR. RAPP: That's all right.

11 Q (By Mr. Rapp) Mr. Patterson, I'm handing you
12 Exhibit 11. The first page is the certification. I'm
13 more interested in the second page.

14 A Yes, sir.

15 Q If you don't mind flipping there. You were
16 eventually charged as a result of the accident that
17 we're talking about with reckless driving, DUI drugs
18 and DUI endangerment of a child under the age of 14,
19 right?

20 A Repeat that.

21 Q Sure. So do you see number two right here?

22 A Uh-huh.

23 Q You were eventually charged with those three
24 crimes, right?

25 A No, sir.

1 Q Tell me what's wrong about that.

2 A What's wrong?

3 Q Well, let me ask you this way: That's your
4 signature at the bottom right, right --

5 A Correct.

6 Q -- under defendant? And this is the plea deal
7 that you struck with the prosecutor, right?

8 A What is the plea deal? I'm not understanding
9 you.

10 Q Okay. Let me ask you this: After the
11 accident, you were charged with certain crimes by the
12 prosecutor, right?

13 A Yes, sir.

14 Q And eventually you pled guilty to some of
15 them, right?

16 A Yes, sir.

17 Q Okay. And this document is you acknowledging
18 that you were pleading guilty to two of those charges,
19 right?

20 A Yes, sir.

21 Q Okay. That's all I wanted to know, okay?

22 A Okay.

23 MR. DOLDER: Are you at a good segway?

24 MR. RAPP: Sure. We can take a break.

25 VIDEO TECHNICIAN: Going off the record. The

1 time is 11:50 a.m.

2 (Discussion ensued off the record.)

3 (Lunch recess from 11:50 a.m. to 1:02 p.m.)

4 VIDEO TECHNICIAN: We're going back on the
5 record. The time is 1:02 p.m. please continue.

6 Q (By Mr. Rapp) Mr. Patterson, you testified
7 earlier that at some point you became aware that the
8 Dunns had sued you and Lawson for injuries from the
9 accident, right?

10 A Yes, sir.

11 Q Do you know when you figured that out?

12 A I don't.

13 Q Okay. Do you know how you learned that?

14 A From court papers, I guess, in the mail.

15 Q Okay. So do you think -- I know you mentioned
16 earlier you didn't remember if you received a copy of
17 the Complaint. Is that what it would have been? Do
18 you know what court papers you received?

19 A I turned them all in. You should have them.

20 Q Okay. So just something came in that you saw
21 your name on the --

22 A Yes, sir.

23 Q -- first page? But you don't know when that
24 was?

25 A Specific date, I do not.

1 Q Do you know if it was in 2017, 2016, '15. Can
2 you give me a year?

3 A I mean, I can't deny what the paper say.
4 Whatever they say there is the date it was.

5 Q Did you -- you didn't contact Lawson when you
6 got the papers, right?

7 A No, sir.

8 Q You didn't contact Columbia National Insurance
9 Company, did you?

10 A No, sir.

11 Q Did you contact anybody when you started
12 getting those court papers?

13 A No, sir.

14 Q At some point in 2016, did you get a call from
15 a lawyer named Mike Rust?

16 A I don't remember that name.

17 Q Okay. How about David Sawyer?

18 A I don't remember the name.

19 Q Okay. But you'll agree that in 2016, you got
20 a call from a lawyer who said he'd been hired to
21 represent you in the lawsuit that you were getting
22 court papers for, right?

23 A If that is after the date of me being the sole
24 name on there, then yes, sir.

25 Q Okay. When you said being the sole name, you

1 mean being the defendant in that case where you were
2 getting the court papers?

3 A I mean, it only had Ronald Curtis Patterson on
4 it.

5 Q Sure.

6 A That's what I mean.

7 Q Okay. So down there -- this is from a
8 different case. Did it look like this, the Court
9 papers?

10 A Yes, sir, similar to that. My eyes aren't
11 real good.

12 Q No, that's fine, but your name was the one
13 underneath where if said defendant?

14 A Yes, sir.

15 Q Okay. But you're not sure when that
16 happened --

17 A No, sir.

18 Q -- when you first figured that out?

19 Did you know that you were the only defendant
20 from looking at it or did somebody tell you?

21 A From looking at it.

22 Q Okay. Did it look different than the other
23 court papers you had got?

24 A They're all hard for me to understand, so you
25 know....

1 Q But something in the paper that you got made
2 you think that you were the only defendant in the case?

3 A Yes, sir.

4 Q Okay. And then you got a call from a lawyer
5 who said he was hired to defend you in that case,
6 right?

7 A Yes, sir.

8 Q And you talked to him a little bit, right?

9 A No, sir, on the telephone.

10 Q That's what I mean. You talked to him on the
11 phone, right?

12 A Yes, sir.

13 Q And scheduled a meeting to go in and talk to
14 him, right?

15 A No. I refused to meet with him.

16 Q Okay. And tell me why you refused to meet
17 with him?

18 A Because at that point, I didn't see anybody
19 that I could trust. I didn't feel like I was -- I was
20 scared to talk to anybody.

21 Q And why did you feel like you couldn't trust
22 anybody?

23 A Well, because initially, you know, everybody
24 was taking care of everybody as far as the insurance or
25 whatever in the case, just like the previous time. Now

1 I'm out there on my own, the sole name on there and I
2 didn't know if they were there to trick me or to hurt
3 me or to help me.

4 Q What made you think they weren't calling to
5 take care of you, like they said they were going to
6 defend you?

7 A Just the way I felt.

8 Q Okay. For no other reason than your name was
9 the only one on the defendant?

10 A Yes, sir.

11 Q Okay. So then when -- you testified before
12 that you had had an accident and Lawson and the
13 insurance company took care of it for you?

14 A Yes, sir.

15 Q And the insurance company was trying to take
16 care of it for you this time, right?

17 A I'm not sure who it was. All I know is it was
18 someone I had never met before.

19 Q Okay. And so you refused to meet with the
20 lawyer that said he'd been hired to represent you in
21 the case?

22 A Yes, sir.

23 Q Did you live at 301 Lake Hill Drive in
24 Gainesville in 2016?

25 A Yes, sir, or '17, '18, yes, sir.

1 (Patterson Exhibit 12 was marked for
2 identification.)

3 Q (By Mr. Rapp) Exhibit 12 is a letter dated
4 February 26, 2016. It's addressed to you at 301 Lake
5 Hill Drive. Do you see that?

6 A Yes, sir.

7 Q That's where you were living at the time?

8 A February 26th, yes, sir.

9 Q Okay. And so do you remember receiving this
10 letter?

11 A They all look the same.

12 Q Okay.

13 A Specifically, no, sir.

14 Q Okay. Do you have any reason to believe you
15 didn't receive it?

16 A No, sir.

17 Q Okay. In the third paragraph down, the very
18 last part of the last sentence, it says: Columbia
19 National Insurance Company has agreed to provide a
20 defense for you in the above-referenced case. Do you
21 see that?

22 A Yes, sir.

23 Q And that is the first time since the accident
24 that you had heard directly from Columbia Insurance
25 Company, right?

1 A I don't recall reading this, so I have to say
2 no.

3 Q Okay. So you think you'd spoken or heard from
4 someone from Columbia Insurance Company before
5 February 2016?

6 A No, sir.

7 Q Okay. So if you received this letter, that
8 would have been the first time you heard from Columbia,
9 right?

10 A I don't recall reading this letter.

11 Q Okay. But you live at 301 Lake Hill -- you
12 lived at 301 Lake Hill Drive, right?

13 MR. DOLDER: Asked and answered.

14 Q (By Mr. Rapp) Well, we're going to go through
15 a whole bunch of letters. So do you remember receiving
16 any letters about the lawsuit?

17 A I do.

18 Q Okay. You'll agree with me that in
19 Exhibit 12, Columbia National Insurance Company was
20 offering to defend you in the lawsuit that you were
21 receiving court papers for, right?

22 MR. DOLDER: I'm going to object on the rule
23 of completeness because you left out the large
24 number of conditions to that.

25 MR. RAPP: Okay.

1 Q (By Mr. Rapp) I'm going to read this sentence
2 to you, okay? You'll agree that this sentence is in
3 the letter dated February 26th: Even though there are
4 provisions in the policy that may restrict or preclude
5 coverage for the claim and/or damages asserted, subject
6 to the following reservation of rights and subject to
7 all the terms and conditions of the Columbia National
8 Insurance Company policy, until further notice,
9 Columbia National Insurance Company has agreed to
10 provide a defense for you in the above-referenced case.
11 Does the letter say that?

12 A The letter makes no sense to me.

13 Q Okay.

14 A You read it.

15 Q Okay. Do you understand that in a lawsuit, if
16 you get sued, you get to be defended by a lawyer?

17 A Yes, sir.

18 Q Okay. And in your criminal case, did you have
19 a lawyer that defended you?

20 A No, sir.

21 (Patterson Exhibit 13 was marked for
22 identification.)

23 Q (By Mr. Rapp) Mr. Patterson, Exhibit 13 is a
24 letter dated March 1st, 2016. Do you see that?

25 A Yes, sir.

1 Q And it's addressed to you at 301 Lake Hill
2 Drive?

3 A Yes, sir.

4 Q Do you remember receiving this letter?

5 A No, sir. It looks just like the previous
6 letter.

7 Q And you're not sure if you ever reviewed it
8 before?

9 A Excuse me?

10 Q You're not sure if you ever received this
11 letter?

12 A I don't understand what you said.

13 Q You're not sure if you ever got this letter in
14 the mail?

15 A In the mail?

16 Q Yeah.

17 A I'm not sure, no, sir.

18 Q Okay. And this is a letter from a lawyer for
19 Columbia National Insurance Company, right?

20 A Strickland & Schwartz is what I see, sir.

21 Q And in the second paragraph, it says: This
22 law firm has been retained by Columbia National
23 Insurance Company with respect to the coverage issues
24 which exist under the above-referenced policies. Do
25 you see that?

1 A I see it.

2 Q Okay. And then the next sentence says:

3 Columbia National Insurance Company has received a
4 notice of the above-referenced lawsuit which has been
5 filed against you. Do you see that?

6 A Yes, sir.

7 Q So you agree this is from Columbia National
8 Insurance Company, right?

9 A No, sir.

10 Q What makes you say that?

11 A It's got a Strickland & Schwartz letterhead.

12 Q Did you understand that this came from a
13 lawyer that represents Columbia National Insurance
14 Company?

15 A People say a lot of things, sir.

16 Q Is that a yes or a no?

17 MR. DOLDER: It's an answer. You're being
18 argumentative.

19 MR. RAPP: Well, I'll ask again.

20 Q (By Mr. Rapp) Did you understand that this
21 came from a lawyer who represented Columbia National
22 Insurance Company?

23 A People say a lot of things, sir. It stated a
24 lot of things, I suppose.

25 Q Okay. So what -- it says what it says, right?

1 A Correct.

2 MR. ALEXANDER: Before you go in the substance
3 of this document, has this been produced?

4 MR. RAPP: No. It's not responsive to
5 anything we got. I got these from Gray Rust.

6 MR. DOLDER: So you're saying that --

7 MR. ALEXANDER: You're producing this exhibit
8 and it's not been disclosed in either the initial
9 disclosures or any of the discovery responses?

10 MR. RAPP: It's not responsive to --

11 MR. ALEXANDER: It's not what?

12 MR. RAPP: It's not a part of any claim
13 filing, anything like that. I got it from Gray
14 Rust.

15 MR. DOLDER: But you're questioning the
16 witness on it in order to support your claims,
17 correct?

18 MR. RAPP: I'm questioning the witness to show
19 that he received these letters that are sent to
20 him.

21 MR. DOLDER: And that helps to support
22 Columbia's claims, correct?

23 MR. RAPP: Possibly.

24 MR. DOLDER: Okay.

25 MR. ALEXANDER: Well, let me ask you this:

1 Before we go further and examine this witness, are
2 there any other documents that you anticipate
3 presenting to this witness that you're producing to
4 counsel for the first time?

5 MR. RAPP: There is going to be a series of
6 letters just like this.

7 MR. ALEXANDER: Okay. Could I review those
8 letters and take a break to review those letters?

9 MR. RAPP: Sure.

10 MR. DOLDER: Yeah. I'd like to see them too,
11 please.

12 MR. RAPP: Okay. Can we go off the record.

13 VIDEO TECHNICIAN: We're going off the record.
14 The time is --

15 MR. ALEXANDER: Let's stay on the record for
16 just a minute or two.

17 Were these documents that you're identifying
18 now, were they part -- were they documents that
19 were referenced in a privilege log?

20 MR. RAPP: No, they're not privileged.

21 MR. ALEXANDER: And they're not privileged
22 because why?

23 MR. RAPP: Because they're letters sent from
24 Gray Rust to Mr. Patterson.

25 MR. ALEXANDER: Okay. So the communications

1 between Mr. Rust and Mr. Patterson -- the Rust firm
2 to Mr. Patterson, Columbia does not consider to be
3 privileged?

4 MR. RAPP: That's what the Court in the
5 underlying held they didn't represent him based on
6 your motion.

7 MR. ALEXANDER: Okay. Just so I'm clear,
8 they're not a part of the privilege log because
9 communications between the Rust firm and
10 Mr. Patterson are not considered privileged by
11 Columbia?

12 MR. RAPP: They're not a part of the privilege
13 log because they're not responsive to any requests
14 for prosecution that were served in the case.

15 MR. ALEXANDER: Or any documents that are used
16 to support your claims. I mean....

17 MR. RAPP: I don't believe there was a request
18 for that.

19 MR. ALEXANDER: Let me ask you this: Isn't
20 that part of the initial disclosures?

21 MR. RAPP: I don't know off the top of my
22 head.

23 MR. ALEXANDER: I think it is.

24 MR. RAPP: Okay. Why don't we take a break
25 and you can review them. If you want to dispute

1 that the letters or have an argument about a letter
2 that was sent to the witness, that's fine.

3 MR. ALEXANDER: I would like to take a break
4 to do that, but I'm also concerned that we're
5 sitting in a deposition and we're getting a
6 document produced to us for the first time, which I
7 believe would be responsive to the initial
8 disclosures. I think they should have been
9 produced at the initial disclosures. Just so while
10 we're on the order, the time to respond to initial
11 disclosures was extended, once, if not twice, as
12 well as the period of time to respond to discovery.
13 So I take issue -- if these documents are not
14 responsive to either the initial disclosures or
15 document request, then I don't know why you're
16 asking him questions about them.

17 MR. RAPP: Well, remember, too, there's a
18 continuing duty to supplement, so they don't have
19 to be -- just because they're not identified if
20 they're even supposed to be in the initial
21 disclosures doesn't mean they don't ever get
22 produced.

23 MR. ALEXANDER: Okay. But you don't
24 supplement them for the first time when you produce
25 them at a deposition.

1 MR. RAPP: We can take a break and you can
2 look at them if you want. I just don't feel --

3 MR. ALEXANDER: I will.

4 MR. RAPP: -- there's really a lot to
5 discuss. And just to be clear, you don't represent
6 Mr. Patterson, right?

7 MR. ALEXANDER: I do not.

8 MR. RAPP: Do you share the same concern with
9 your witness?

10 MR. DOLDER: I absolutely do, and I've --
11 that's why I asked if they were to support your
12 claims and you said that that was -- the answer to
13 that question was maybe, which would mean they are
14 responsible to initial disclosures.

15 MR. RAPP: Okay. And so -- well, let's take a
16 break and you can look at them.

17 MR. DOLDER: They should have been produced.

18 VIDEO TECHNICIAN: We're going off the record.
19 The time is 1:19 p.m.

20 (Whereupon, there was a recess from 1:19 p.m.
21 to 1:34 p.m.)

22 (Patterson Exhibits 14 through 23 were marked
23 for identification.)

24 VIDEO TECHNICIAN: Stand by, please. We're
25 going back on the record at 1:34 p.m.

1 MR. DOLDER: Okay. Well, I am going to allow
2 the deposition to proceed only because I don't want
3 Mr. Patterson to have to come back and to reconvene
4 the deposition. It is under objection. I believe
5 that these letters that you have shown should
6 have -- I'd have to go over discovery request to
7 see if they're responsive to a discovery request,
8 but I can see very clearly how they are -- the
9 questioning will be designed to support Columbia's
10 defenses. That makes them responsive to initial
11 disclosures and there should have been a prompt
12 supplemental disclosure, and it seems like we're
13 getting sand bagged, but go ahead.

16 MR. DOLDER: Is there any that hasn't been
17 produced besides these?

18 MR. RAPP: Not that are responsive, no?

19 MR. DOLDER: Okay.

20 MR. ALEXANDER: You say not that are
21 responsive. I guess that's where we kind of run
22 into a little bit of a question about whether it's
23 responsive or not responsive.

24 MR. RAPP: Well, the question is are there
25 other documents that we are going to use or might

1 use to support our defenses and the answer is not
2 that I'm aware of right now.

3 I'll make it actually easier and just ask a
4 couple of questions. You can just -- I'm just
5 going to give him the whole stack.

6 MR. DOLDER: Oh, let me see 14, please.

7 MR. ALEXANDER: The March 16th record starts
8 with number 14 and just go through?

9 MR. RAPP: Yes.

10 MR. ALEXANDER: Okay. And just for purposes,
11 I, on behalf of the Dunns join in Mr. Dolder's
12 concerns about the document.

13 MR. RAPP: Okay.

14 Q (By Mr. Rapp) Mr. Patterson, if you could
15 just take a look at the stack of documents I gave you
16 right there, if you haven't already.

17 A Okay.

18 MR. DOLDER: And these are -- just for the
19 record, these are marked as Exhibits 14 through 23.

20 Q (By Mr. Rapp) Would you agree with me that
21 Exhibits 14 through 23 are a series of letters that are
22 addressed to you at 301 Lake Hill Drive?

23 A Yes, sir.

24 Q Do you remember receiving any of these
25 letters?

1 A I can't be specific because I can't remember
2 reading any of them.

3 Q So you're not sure if you did or did not
4 receive them; is that right?

5 A I'm not sure that I did receive every page
6 that you've handed me.

7 Q Okay. But from March 16th, 2016 to May 1st,
8 2017, were you residing at 301 Lake Hill Drive?

9 A Yes, sir. Through what --

10 Q Through May 1st, 2017.

11 A Yes, sir.

12 Q Let me ask you another question. You
13 mentioned earlier that after the accident, Mr. Rich
14 came and talked to you at your house?

15 A That's not how I would word it, no, sir.

16 Q Okay. Well, when he came to your house, you
17 said he took your gas card and your cell phone and the
18 keys to the truck, right?

19 A That happened, yes, sir.

20 Q Okay. And so you didn't have an extra set of
21 keys to the truck, did you?

22 A I had one set of keys to the pickup.

23 Q And those are the ones that Mr. Rich took that
24 day, right?

25 A Yes.

1 Q Okay. So you couldn't use the truck anymore?

2 A No, sir.

3 Q Okay. You talked about another accident where

4 you ran into a skateboarder?

5 A He ran into me, but yes, sir.

6 Q Did the police find that it was his fault or

7 your fault?

8 A I have no idea.

9 Q Okay. Was it during the daytime?

10 A Late afternoon, yes, sir.

11 Q Okay. Were you working for Lawson at the time

12 when -- were you employed by Lawson when you hit the

13 skateboarder?

14 A I hit him in the Lawson truck.

15 Q That's what I mean. At the time, you work for

16 Lawson when that happened?

17 A I was not on the clock, no.

18 Q Okay. Was it after you had completed a job on

19 your way home?

20 A It was after I completed a workday, yes, sir.

21 Q Were you on your way home?

22 A No, sir.

23 Q Were you on your way to get your check?

24 A No, sir.

25 Q Where were you headed?

1 A I was at -- to my mother's house.

2 Q You were going to your mother's house?

3 A Yes, sir.

4 Q Okay. Where did she live at the time, if you
5 remember?

6 A She's at 911 Charleston Court.

7 Q In what town?

8 A Gainesville, Georgia.

9 Q Okay. At some point during the lawsuit that
10 the Dunns filed against you and Lawson, did you
11 understand that the court was ordering you to appear at
12 a hearing to talk to the judge?

13 A No, sir.

14 Q Did you understand that the judge had ordered
15 you to do anything in the underline -- in that case,
16 excuse me?

17 A I was not understanding of anything, no, sir.

18 Q Did you ever talk to anybody about what was
19 happening in that case after that initial conversation
20 you had with the lawyer? So in other words --

21 A What conversation?

22 Q Sure. Let's go back. So you were receiving
23 papers, you said --

24 A Yes, sir.

25 Q -- that had to do with the lawsuit, right?

1 A Yes.

2 MR. DOLDER: Let him finish his question.

3 Q (By Mr. Rapp) And did you ever call and talk
4 to anybody about those papers?

5 A Regarding who?

6 Q Well, you said you noticed that you were a
7 defendant in those court papers, right?

8 A Yes, sir.

9 Q Did you ever call and talk to anybody about
10 that, the clerk, the judge?

11 A Oh, no, sir. I've talked to my father and my
12 mama.

13 Q Sure.

14 A Nobody legally, no, sir.

15 Q Okay. Other than your family members or your
16 friends, you didn't talk to anybody about that, the
17 Court papers?

18 A At what time, what timeline?

19 Q Before this case that we're all here about.

20 A Well, before this, that could have been last
21 December. You're talking about how far after the
22 accident?

23 Q So how about any time in 2016 or --

24 A No, sir.

25 Q -- the first half of 2017?

1 A No, sir.

2 Q Okay. Did you -- in the skateboard incident,
3 you said you understood that Lawson or the insurance
4 company or somebody was taking care of it for you,
5 right?

6 A You're jumping into too much of a timeline. I
7 can't be accurate on my answers because you're going
8 from one thing to another. I don't understand exactly
9 what you're saying.

10 Q Okay. Do you remember when we talked about
11 the incident where you hit the skateboarder?

12 A I do.

13 Q And do you remember when you testified that
14 Lawson or the insurance company took care of that
15 incident for you?

16 A The skateboarder?

17 Q Yes, sir.

18 A Yes, sir.

19 Q Okay. How did you know that either Lawson or
20 the insurance company was taking care of that
21 skateboard incident for you?

22 A Direct contact from Ms. Davis.

23 Q Okay. And Ms. Davis works for Lawson's,
24 right?

25 A She owns Lawson's.

1 Q Why didn't you think that Lawson or the
2 insurance company was taking care of the lawsuit that
3 the Dunns sued you in?

4 MR. ALEXANDER: Object.

5 MR. DOLDER: Object to the form and object
6 that it conflicts with prior testimony.

7 Q (By Mr. Rapp) Did you think that Lawson or an
8 insurance company was going to take care of the lawsuit
9 that the Dunns filed against you and Lawson?

10 A Yes, sir.

11 Q And so when the attorney that you spoke to on
12 the phone called you, didn't you think that was Lawson
13 or the insurance company trying to take care of that
14 lawsuit for you?

15 A No, sir.

16 Q Okay. And tell me again why.

17 A Because it was after the fact of I was the
18 single one hung out to dry there.

19 Q And what made you think you were hung out to
20 dry?

21 A Because I was no longer married with Lawson's
22 company on the paperwork, letterheads or whatever, the
23 court papers.

24 Q And did you understand that because you were
25 no longer married to Lawson on the paperwork, that it

1 was somehow too late for someone to take care of you in
2 that lawsuit?

3 A That never occurred. I never thought that
4 way, no, sir.

5 Q Okay. So then why didn't you agree to meet
6 with the lawyers to try to defend you in the case?

7 A Because I didn't trust them. They were too
8 pushy and badgering, just continuous.

9 Q Okay. As a result of your plea agreement for
10 the accident in the WalMart parking lot -- do you know
11 what I mean when I say plea agreement?

12 A I assume -- no, sir. You tell me.

13 Q Do you remember the document we looked at that
14 indicated that you pled guilty to DUI and DUI and
15 endangerment of a child under the age of 14?

16 A Yes, sir.

17 Q As a result of that plea agreement, did you
18 serve jail time?

19 A Yes, sir.

20 Q How long were you in jail?

21 A A week or so. It was days. It wasn't -- it
22 was a number of days.

23 Q Since that time, have you been arrested?

24 A Yes, sir.

25 Q How many times?

1 A I don't recall.

2 Q What were you arrested for?

3 A Probation. I was on probation.

4 Q Were you on probation in connection with the
5 plea agreement from the WalMart accident?

6 A Yes, sir.

7 Q Okay. And did someone allege that you
8 violated your probation?

9 A I can't recall exactly, but it was some type
10 of violation or I wouldn't have been locked up.

11 Q So you went back to jail for a probation
12 violation?

13 A I have, yes.

14 Q Okay. How many times?

15 A One time.

16 Q Okay. How long were you in jail?

17 A I can't recall. It's all documented, though.
18 We can find out.

19 Q Any other arrests other than the probation
20 violation since 2013?

21 A Not that I -- yes.

22 Q What was the other one or ones?

23 A It was -- I was locked up in Jackson County.

24 Q And what were you locked up for?

25 A For a domestic dispute.

1 Q Okay. Were you ever charged with a crime
2 arising out of that domestic dispute?

3 A No, sir.

4 Q Okay. Did you -- so you were never convicted
5 of any crime arising out of that domestic dispute,
6 right?

7 A No, sir.

8 Q Okay. And you didn't plead guilty to anything
9 like the sheet we looked at earlier for the domestic
10 dispute?

11 MR. DOLDER: I'm just going to instruct the
12 witness, my client, because just I can tell from
13 your face you look confused --

14 THE WITNESS: I'm very confused.

15 MR. DOLDER: Don't speculate or guess as to
16 the answers to these questions.

17 THE WITNESS: Yes, sir.

18 MR. DOLDER: Okay. Just answer the questions
19 that you know the answer to.

20 THE WITNESS: Yes, sir.

21 Q (By Mr. Rapp) To the best of your knowledge,
22 the prosecutor didn't charge you with any crimes for
23 the domestic dispute incident?

24 A I don't recall.

25 Q Okay. Did you serve any jail time for the

1 domestic dispute?

2 A No, sir.

3 Q Okay. Did you -- were you placed on probation
4 as a result of that domestic dispute?

5 A No, sir.

6 Q Okay. Any other arrests since 2013 that we
7 haven't talked about?

8 A Not that I can recall.

9 Q Okay. Are you taking any medication today
10 that might affect your memory?

11 A No, sir.

12 MR. RAPP: Okay. That's all I have.

13 EXAMINATION

14 BY MR. DOLDER:

15 Q I have just a few questions. Mr. Patterson,
16 did Ottie Rich use a Lawson vehicle for personal
17 purposes?

18 A Yes, sir.

19 Q How do you know that?

20 A He kept a booster seat and car seat in the
21 company vehicle pretty much all the time.

22 Q Okay. He had a car seat in the Lawson
23 vehicle?

24 A Yes, sir.

25 Q All right. Now, your youngest is five years

1 old, correct?

2 A Yes, sir.

3 Q All right. Was -- and that's a boy?

4 A Yes, sir.

5 Q Was he born while you worked at Lawson?

6 A He was.

7 Q All right. Did you use the Lawson truck to
8 take your wife to the hospital?

9 A I did.

10 Q And while you were at the hospital, where did
11 you park the Lawson truck?

12 A In front of the emergency room.

13 Q All right. And how long were you in the
14 hospital?

15 A Around three days.

16 Q Was the Lawson truck out in the parking lot
17 the whole time?

18 A Yes, sir.

19 Q Did anyone at Lawson -- let me reword that.
20 Did you tell anyone at Lawson that you had your truck,
21 your Lawson truck parked at the hospital?

22 A I did.

23 Q Okay. Who did you tell?

24 A Ottie Rich, James Brown, Billy Blankenship.

25 Q Okay. Why did you tell them?

1 A Oh, because in case I had any of the tools
2 that might be needed while I was absent, to just holler
3 at me and I'll meet them down in the parking lot and
4 make sure that they get anything that I had access to
5 that might be needed on the jobs.

6 Q Now -- so you have testified that you drove a
7 Lawson truck for about a year, correct?

8 A Yes, sir.

9 Q All right. And are you able to remember all
10 of the examples of seeing Lawson personnel driving
11 Lawson vehicles for personal purposes?

12 A No, sir.

13 Q And why is that?

14 A Because it's too many to comprehend at one
15 time.

EXAMINATION

19 BY MR. RAPP:

20 Q When you parked your truck in front of the
21 hospital and you told the folks at Lawson, did they say
22 that was okay to leave the truck at the hospital?

23 A It was not mentioned.

24 Q I thought you just said they told you it was
25 okay to leave the truck there so they could come get

1 your tools?

2 A I'm not understanding how you're twisting my
3 words.

4 Q You said you parked the truck in front of the
5 hospital and you told someone at Lawson that that's
6 where the truck was in case they needed the tools,
7 right?

8 A Yes, sir.

9 Q And they said that was okay, right?

10 A They had no problem with it, yes, sir.

11 MR. RAPP: That's all I have?

12 MR. DOLDER: Anything else?

13 MR. RAPP: I think we're done.

14 MR. ALEXANDER: No.

15 MR. RAPP: Thank you. Appreciate it.

16 VIDEO TECHNICIAN: This concludes the
17 deposition of Ronald Patterson. We're off the
18 record at 1:52 p.m.

19 COURT REPORTER: Would you like me to produce
20 a transcript?

21 MR. ALEXANDER: Yes.

22 COURT REPORTER: Would you like a copy of the
23 transcript?

24 MR. RAPP: Yes, please.

25 MR. DOLDER: Yes.

1 (Whereupon, the deposition concluded at 1:52 p.m.)
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1 DISCLOSURE

2 STATE OF GEORGIA
3 COUNTY OF HALL
3 DEPONENT: RONALD CURTIS PATTERSON

4 Pursuant to Article 10.B of the Rules and
5 Regulations of the Board of Court Reporting of the
5 Judicial Council of Georgia, I make the following
disclosure:

6 I am a Certified Court Reporter. I am here as an
7 independent contractor to Appalachian Court Reporting.

8 Appalachian Court Reporting was contacted by Mark
9 Alexander, Esq. to provide court reporting services for
this deposition. I am not disqualified for a
relationship of interest under the provisions of the
10 O.C.G.A. 9-11-28(c). Appalachian Court Reporting will
11 not be taking this deposition under any contract that
is prohibited by the O.C.G.A. 15-14-37(a) and (b).

12 Appalachian Court Reporting has no
13 contract/agreement to provide court reporting services
with any party to the case, any counsel in the case or
any reporter or reporting agency from whom a referral
14 might have been made to cover this deposition.
Appalachian Court Reporting has charged its usual and
15 customary rates to all parties in the case.

17 
18 AURORA GUTIERREZ
19 Certified Court Reporter (CCR #2599)



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24
25

C E R T I F I C A T E

2 STATE OF GEORGIA

3 COUNTY OF HALL

4 I hereby certify that the foregoing deposition was
5 taken down, as stated in the caption, and the
6 colloquies, questions and answers were reduced to
7 typewriting under my direction; that the foregoing
8 transcript is a true and correct record given to the
9 best of my ability.

10 The above certification is expressly withdrawn upon
11 the disassembly or photocopying of the forgoing
12 transcript, unless said disassembly or photocopying is
13 done under the auspices of Absolute Court Reporting,
14 LLC and the signature and original seal is attached
15 thereto.

16 I further certify that I am not a relative,
17 employee, attorney, or counsel of any of the parties;
18 nor am I financially interested in the action.

19

20 Aurora Gutierrez
21 AURORA GUTIERREZ
Certified Court Reporter (CCR #2599)



ERRATA

2 | Reporter: Aurora Gutierrez

3 I, RONALD CURTIS PATTERSON, have read the transcript
4 of my deposition given on the date of June 20, 2108,
5 consisting of numbered pages 1 through 106, and (please
6 initial one of the blanks below and sign on the last
7 page):

8 I desire to make no changes;

9 _____ I desire to make the following changes in the
10 transcript and have stated my reason for each change:

12. *Reino Unido* abordó la cuestión

14 Reasons for change:

15 Page 1 line should read:

Reason for change:

17 Page Line should read:

Reason for change:

19 Page Line should read:

Reason for change:

21 Page Line should read:

22 Reason for change:

23 Page Line should read:

24 Reason for change: _____

25 Page ____ Line ____ should read: _____

1 Reason for change: _____

2 Page ____ Line ____ should read: _____

3 Reason for change: _____

4 Page ____ Line ____ should read: _____

5 Reason for change: _____

6 Page ____ Line ____ should read: _____

7 Reason for change: _____

8 Page ____ Line ____ should read: _____

9 Reason for change: _____

10 (Note: Additional pages may be attached hereto.)

11 Signed by me, this _____ day of _____, 2018.

12

13

14

15 RONALD CURTIS PATTERSON

16

17 Sworn to and subscribed before
18 Me, this ____ day of _____,
2018.

19

20 Notary Public

21 County, Georgia

22 My Commission Expires _____.

23

24

25